

From at least as early as April, 2014 and continuing up to and including April, 2016, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants WILLIAM B. MURPHY, MICHAEL W. SPELLMAN, PETER REICHERT, DUSTIN ROBINSON, YOUNG HEE PARK and SO YOUNG PARK, did knowingly and intentionally combine, conspire, confederate and agree together and with each other and with diverse others known and unknown to the Grand Jury to distribute and to possess

with the intent to distribute 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(vii).

**MANNER AND MEANS OF THE CONSPIRACY**

A. It was part of the conspiracy that WILLIAM B. MURPHY grew marijuana in Hawaii and procured marijuana from other sources in Hawaii, California and Oregon to have it distributed to individuals in the Northern District of Ohio and elsewhere.

B. It was further part of the conspiracy that MICHAEL W. SPELLMAN packaged the marijuana inside five-pound, foil coffee bags, that also contained loose coffee beans and then mailed them to various addresses in Northern Ohio and elsewhere.

C. It was further part of the conspiracy that MICHAEL W. SPELLMAN used the name Jay Bernstein when mailing packages containing marijuana to Northern Ohio and elsewhere.

D. It was further part of the conspiracy that WILLIAM B. MURPHY paid MICHAEL W. SPELLMAN \$100 for each package containing marijuana that he mailed.

E. It was further part of the conspiracy that WILLIAM B. MURPHY established the Kona Coffee 808 in Hawaii as a front business to conceal his marijuana trafficking activities.

F. It was further part of the conspiracy that PETER REICHERT received parcels containing marijuana mailed from Hawaii, California and Oregon, at various addresses in Northern Ohio for further distribution.

G. It was further part of the conspiracy that DUSTIN ROBINSON received parcels of marijuana at various addresses in Pennsylvania that were mailed from Hawaii and California, as directed by MURPHY and SPELLMAN.

H. It was further part of the conspiracy that DUSTIN ROBINSON mailed bulk United States currency from East Liverpool, Ohio to MICHAEL W. SPELLMAN.

I. It was further part of the conspiracy that WILLIAM B. MURPHY and MICHAEL W. SPELLMAN had the proceeds of the marijuana sales mailed to several post office boxes they rented in Hawaii and California.

J. It was further part of the conspiracy that MURPHY instructed SPELLMAN to pick up the parcels of United States currency at the Post Office Boxes they rented in Hawaii.

K. It was further part of the conspiracy that WILLIAM B. MURPHY instructed YOUNG HEE PARK to receive payments of cash in Northern Ohio from various marijuana customers of MURPHY and SPELLMAN. YOUNG HEE PARK then mailed parcels of United States currency from Northern Ohio to MURPHY in Hawaii.

L. It was further part of the conspiracy that WILLIAM B. MURPHY instructed SO YOUNG PARK to communicate with YOUNG HEE PARK in Korean regarding the receipt and disposition of the United States currency in Northern Ohio.

M. It was further part of the conspiracy that YOUNG HEE PARK wrapped the bulk United States currency with aluminum foil and gift-wrapping paper and put it in vacuum-sealed plastic bags for mailing.

N. It was further part of the conspiracy that in order to conceal the source and nature of the currency, YOUNG HEE PARK listed the sender as a business entity that she was not associated with or would use a fictitious individual's name as the sender.

O. It was further part of the conspiracy that to avoid suspicion at any one United States Postal Service branch, YOUNG HEE PARK shipped the packages containing the currency from over twenty-five different postal branches in Northern Ohio, often shipping parcels from multiple branches in a single day.

P. It was further part of the conspiracy that from on or about April 23, 2014 to on or about March 31, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY, MICHAEL W. SPELLMAN and others both known and unknown to the Grand Jury, caused approximately 1,113 parcels containing marijuana to be shipped from Hawaii, California and Oregon to the Northern District of Ohio, Eastern Division and elsewhere.

Q. It was further part of the conspiracy that from on or about May 5, 2014 to on or about April 5, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY, MICHAEL W. SPELLMAN, SO YOUNG PARK, YOUNG HEE PARK and others both known and unknown to the Grand Jury, caused approximately 965 parcels containing bulk United States currency to be shipped from the Northern District of Ohio to Hawaii, California, Oregon and elsewhere.

#### **Acts in Furtherance of the Conspiracy**

In furtherance of the aforementioned conspiracy and to effect the objects thereof, WILLIAM B. MURPHY, MICHAEL W. SPELLMAN, PETER REICHERT, DUSTIN ROBINSON, YOUNG HEE PARK, SO YOUNG PARK, and other members of the conspiracy performed the following acts and others in the Northern District of Ohio and elsewhere.

1. From in or about May, 2014, through in or about March, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY and MICHAEL W. SPELLMAN purchased at least nine hundred (900), five-pound, empty, foil, coffee bags from a wholesaler in Hawaii.

2. On or about June 5, 2014, WILLIAM B. MURPHY rented Post Office Box 25XX, in Kealahou, Hawaii in the name Kona Coffee 808, Inc.

3. On or about June 6, 2014, WILLIAM B. MURPHY rented Post Office Box 4XX, in Honaunau, Hawaii in the name Kona Coffee 808, Inc.

4. On or about July 30, 2014, MICHAEL W. SPELLMAN rented a mailbox from Regus' on Superior Avenue in Cleveland, Ohio, in the name Kona Coffee 808, Inc.

5. On or about October 29, 2014, MICHAEL W. SPELLMAN rented a mailbox from Regus' in San Rafael, California, in the name Kona Coffee 808.

6. On or about September 10, 2015, DUSTIN ROBINSON mailed a parcel containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahou, Hawaii. The parcel was addressed from DUSTIN ROBINSON to MICHAEL SPELLMAN.

7. On or about September 18, 2015, DUSTIN ROBINSON mailed a parcel containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahou, Hawaii.

8. On or about October 7, 2015, DUSTIN ROBINSON mailed two parcels containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahkekua, Hawaii. The parcels were addressed from DUSTIN ROBINSON to MICHAEL SPELLMAN.

9. On or about October 14, 2015, DUSTIN ROBINSON mailed four parcels containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahkekua, Hawaii. The parcels were addressed from DUSTIN ROBINSON to MICHAEL SPELLMAN.

10. On or about October 27, 2014, DUSTIN ROBINSON mailed two parcels containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahkekua, Hawaii.

11. On or about November 5, 2015, DUSTIN ROBINSON mailed a parcel containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahkekua, Hawaii.

12. On or about November 16, 2015, DUSTIN ROBINSON mailed a parcel containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahkekua, Hawaii. The parcel was addressed from DUSTIN ROBINSON to MICHAEL SPELLMAN.

13. On or about November 20, 2015, an individual known to the Grand Jury rented a mailbox from Regus' in Sausalito, California in the name S'Iras Inc.

14. On or about November 23, 2015, an individual known to the Grand Jury rented a mailbox from Regus' in Beachwood, Ohio in the name S'Iras Inc.

15. On or about November 23, 2015, DUSTIN ROBINSON mailed a parcel containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahkekua, Hawaii.

16. On or about December 9, 2015, DUSTIN ROBINSON mailed two parcels containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahkekua, Hawaii.

17. On or about December 24, 2015, DUSTIN ROBINSON mailed two parcels containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahkekua, Hawaii.

18. On or about January 5, 2016, WILLIAM B. MURPHY and MICHAEL W. SPELLMAN caused five parcels that each contained \$4,980 (totaling \$24,880) in United States currency to be mailed from three different United States Post Offices in the Northern District of Ohio to two different Post Office Boxes in Hawaii. The listed sender was Kona Coffee 808 Inc. at 6XX Superior Avenue, Suite XXXX, Cleveland, Ohio. Three of the parcels were addressed to K.C. 808 Inc. at P.O. Box 25XX, Kealahkekua, Hawaii and two of the parcels were addressed to K.C. 808 Inc. at P.O. Box 4XX, Honaunau, Hawaii. The United States currency in each parcel was wrapped in aluminum foil, gift-wrapping paper and was in vacuum-sealed plastic bags.

19. On or about February 20, 2016, MICHAEL W. SPELLMAN and WILLIAM B. MURPHY submitted a mail theft and vandalism complaint regarding the missing \$24,880 in U.S. Currency to the Postmaster at the Post Office in Kealahkekua, Hawaii. In the complaint WILLIAM B. MURPHY wrote that the parcels each contained \$4,980 in cash for a total of \$24,880 and claimed they were stolen.

20. In or about February, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY and MICHAEL W. SPELLMAN sent two parcels containing marijuana from Hawaii to PETER REICHERT in Northern Ohio. On or about February 16, 2016, PETER REICHERT retrieved those parcels from a residence at 128XX Caves Road, Chesterland, Ohio.

21. On or about February 19, 2016, DUSTIN ROBINSON mailed a parcel containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahou, Hawaii.

22. In or about February, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY and MICHAEL W. SPELLMAN caused a parcel containing approximately two pounds of marijuana concealed in two, five-pound coffee bags to be mailed to an address at XXXXX Almar Drive, Shaker Heights, Ohio. The marijuana was vacuum-sealed inside two, gold-colored, five-pound coffee bags that also contained coffee beans.

23. On or about February 23, 2016, YOUNG HEE PARK mailed a parcel containing United States currency from Shaker Heights, Ohio, to a Post Office Box in Honaunau, Hawaii. The parcel was addressed from S'Iras, Inc. to S'Iras, Inc.

24. On or about February 23, 2016, YOUNG HEE PARK mailed a parcel containing United States currency from Beachwood, Ohio, to a Post Office Box in Keauhou, Hawaii. The parcel was addressed from S'Iras, Inc. to S'Iras, Inc.

25. On or about February 23, 2016, YOUNG HEE PARK mailed two parcels containing United States currency from Beachwood, Ohio, to an address on Redwood Blvd., Novato, California. The parcels were addressed from S'Iras, Inc. to S'Iras, Inc.



26. In or about February, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY, caused parcels containing marijuana to be mailed from California to PETER REICHERT in Northern Ohio. On or about February 24, 2016, REICHERT retrieved those parcels containing marijuana from a residence at 128XX Caves Road, Chesterland, Ohio.

27. On or about March 2, 2016, DUSTIN ROBINSON mailed a parcel containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahou, Hawaii. The parcel was addressed from DUSTIN ROBINSON to MICHAEL SPELLMAN.

28. On or about March 3, 2016, YOUNG HEE PARK mailed a parcel containing United States currency from Shaker Heights, Ohio, to a Post Office Box in Kealahou, Hawaii. The parcel was addressed from S'Iras, Inc. to S'Iras, Inc.

29. On or about March 3, 2016, YOUNG HEE PARK mailed a parcel containing United States currency from Beachwood, Ohio, to a Post Office Box in Kealahou, Hawaii. The parcel was addressed from S'Iras, Inc. to S'Iras, Inc.

30. On or about March 5, 2016, YOUNG HEE PARK mailed two parcels containing United States currency from Cleveland, Ohio; one to a Post Office Box in Kealahou, Hawaii, and; one to a Post Office Box in Portland, Oregon. The parcel to Hawaii was addressed from S'Iras, Inc. to S'Iras, Inc. The parcel to Oregon was addressed from S'Iras, Inc. to B1 Productions.

31. On or about March 7, 2016, YOUNG HEE PARK mailed two parcels containing United States currency from Shaker Heights, Ohio; one to a Post Office Box in Kealahou, Hawaii and; one to an address at XXXX Redwood Blvd., Novato, California. The parcels were addressed from S'Iras, Inc. to S'Iras, Inc.

32. On or about March 9, 2016, YOUNG HEE PARK mailed a parcel containing United States currency from Beachwood, Ohio to an address in Portland, Oregon. The parcel was addressed from S'Iras, Inc. to Silica Gallery.

33. On or about March 10, 2016, DUSTIN ROBINSON mailed a parcel containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahou, Hawaii. The parcel was addressed from DUSTIN ROBINSON to MICHAEL SPELLMAN.

34. On or about March 14, 2016, YOUNG HEE PARK mailed a parcel containing United States currency from Shaker Heights, Ohio to 5XX Casto St., P.O. Box 5XX, San Francisco, California. The parcel was addressed from S'Iras, Inc. to Nate Aubrey.

35. On or about March 14, 2016, YOUNG HEE PARK mailed a parcel from Beachwood, Ohio to 5XX Casto St., P.O. Box 5XX, San Francisco, California. The parcel was addressed from S'Iras, Inc. to Nate Aubrey.

36. On or about March 15, 2016, DUSTIN ROBINSON mailed a parcel containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahou, Hawaii. The parcel was addressed from DUSTIN ROBINSON to MICHAEL SPELLMAN.

37. On or about March 16, 2016, YOUNG HEE PARK mailed a parcel containing United States currency from Beachwood, Ohio to XXXX Redwood Blvd., Novato, California. The parcel was addressed from S'Iras, Inc. to S'Iras, Inc.

38. In or about March, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY mailed a parcel containing approximately two pounds of marijuana concealed in two, five-pound coffee bags from California to an address at XXXXX East Hill Drive, Chesterland, Ohio.

39. On or about March 21, 2016, DUSTIN ROBINSON mailed a parcel containing United States currency from East Liverpool, Ohio to a Post Office Box in Kealahou, Hawaii. The parcel was addressed from DUSTIN ROBINSON to MICHAEL SPELLMAN.

40. On or about March 21, 2016, YOUNG HEE PARK mailed two parcels containing United States currency from Beachwood, Ohio to Post Office Boxes in Keauhou and Honaunau, Hawaii. Both of the parcels were addressed from S'Iras, Inc. to S'Iras, Inc.

41. On or about April 5, 2016, DUSTIN ROBINSON mailed a parcel from Northern Ohio containing \$4,880 in United States currency to a Post Office Box in Hawaii. The parcel was addressed from DUSTIN ROBINSON to MICHAEL SPELLMAN. The United States currency was wrapped in aluminum foil, inside of a vacuum-sealed plastic bag.

42. In or about April, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY caused seven parcels containing United States currency to be mailed from Northern Ohio to two addresses in California. Three of the parcels were addressed to a Suite on One Harbor Drive, Sausalito, California. Four of the parcels were addressed to XXXX Redwood Blvd., Novato, California. Six of the parcels contained \$4,980 and one parcel contained \$4,960 for a total of \$34,840. The United States currency was wrapped in aluminum foil, gift-wrapped and packed in vacuum-sealed plastic bags.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges:

From in or about April, 2014, through in or about April, 2016, the exact dates to the Grand Jury unknown, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants, WILLIAM B. MURPHY, MICHAEL W. SPELLMAN, YOUNG HEE PARK, SO

YOUNG PARK and others both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree together and with diverse others both known and unknown, to knowingly and intentionally conduct and attempt to conduct a series of financial transactions affecting interstate commerce, which transactions involved the proceeds from a specified unlawful activity; that is, conspiracy to distribute and to possess with intent to distribute marijuana, in violation of Title 21, United States Code, Section 846, knowing that the transactions involved the proceeds of some form of specified unlawful activity, and (1) knowing that the transactions were designed in whole or in part to conceal the nature, location, source, ownership and control of the proceeds of said unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and (2) knowing that they were engaging in a monetary transaction in criminally derived property of a value greater than \$10,000 derived from said unlawful activity, in violation of Title 18, United States Code, Section 1957.

**MANNER AND MEANS OF THE CONSPIRACY**

A. It was part of the conspiracy that MICHAEL W. SPELLMAN opened a bank account ending in 2749 at Fifth Third Bank in Mentor, Ohio. MICHAEL W. SPELLMAN and WILLIAM B. MURPHY directed individuals in Northern Ohio, both known and unknown to the Grand Jury, to deposit United States currency into the Fifth Third Bank account.

B. It was further part of the conspiracy that in order to avoid detection the deposits into SPELLMAN'S Fifth Third Bank account were made from at least fifteen different bank branches, in Northern Ohio, and elsewhere.

C. It was further part of the conspiracy that MICHAEL W. SPELLMAN used his debit card from his Fifth Third Bank account ending in 2749 in Hawaii to pay bills and also to withdraw United States currency directly from the account.

D. It was further part of the conspiracy that MICHAEL W. SPELLMAN spent the funds in his Fifth Third Bank account ending in 2749 but also withdrew some of it to deposit it into bank accounts at the Bank of Hawaii.

E. It was further part of the conspiracy that MICHAEL W. SPELLMAN used the debit card from his Fifth Third Bank account ending in 2749 to make purchases in Hawaii.

F. It was further part of the conspiracy that MICHAEL W. SPELLMAN maintained a Chase United Bank Credit Card that SPELLMAN and WILLIAM B. MURPHY used for personal expenses and purchases. SPELLMAN paid the Chase United Bank Credit Card balance with funds from his Fifth Third Bank account ending in 2749.

G. It was further part of the conspiracy that WILLIAM B. MURPHY opened a PNC Bank account ending in 6119 in Northern Ohio.

H. It was further part of the conspiracy that SO YOUNG PARK maintained two bank accounts at PNC Bank ending in 6304 and 5064.

I. It was further part of the conspiracy that YOUNG HEE PARK met with MURPHY and SPELLMAN'S drug customers in Northern Ohio, collected United States currency from them, and deposited the proceeds in MURPHY'S and SO YOUNG PARK'S PNC Bank accounts.

J. It was further part of the conspiracy that in order to disguise the source and nature of the funds and to avoid financial reporting requirements, YOUNG HEE PARK deposited the United States currency in at least thirteen different PNC Bank branches in Northern Ohio.

K. It was further part of the conspiracy that WILLIAM B. MURPHY and SO YOUNG PARK used funds deposited into their PNC bank accounts ending in 6119, 6304 and 5064 to purchase items and to pay personal expenses in Hawaii and elsewhere.

### **Acts in Furtherance of the Conspiracy**

In furtherance thereof, and to affect the goals and to conceal the existence of the conspiracy, the defendants performed and caused others to perform acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

1. From in or about April, 2014, to in or about April, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY and MICHAEL W. SPELLMAN deposited at least \$209,810.00 in United States currency into SPELLMAN'S Fifth Third Bank account ending in 2749.

2. MICHAEL W. SPELLMAN and WILLIAM B. MURPHY used MICHAEL W. SPELLMAN'S Chase United Bank credit card to purchase airline tickets from United Airlines for flights to and from Cleveland, Ohio and Hawaii totaling \$40,959.41; drones from Drones, Etc. totaling \$13,062.70; a water tank from Pacific Watertank Supply for \$3,532.22 and a greenhouse from Gateway concepts for \$10,632.46 in Hawaii. From MICHAEL W. SPELLMAN'S Fifth Third Bank account ending in 2749 he paid \$58,850 toward the balance on his Chase United Bank credit card.

3. From in or about April, 2014, to in or about March, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY, SO YOUNG PARK and YOUNG HEE PARK caused approximately \$48,090.00 in United States currency to be deposited into WILLIAM B. MURPHY'S PNC Bank account ending in 6119.

4. From in or about April, 2014, to in or about March, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY, SO YOUNG PARK and YOUNG HEE

PARK caused approximately \$90,100.00 in United States currency to be deposited into SO YOUNG PARK'S PNC Bank accounts ending in 6304 and 5064.

5. From in or about April, 2014, to in or about March, 2016, the exact dates unknown to the Grand Jury, WILLIAM B. MURPHY and SO YOUNG PARK used funds deposited in their PNC Bank accounts ending in 6119, 6304 and 5064 to pay their living expenses. MURPHY withdrew approximately \$3,083.15 from automated teller machines in Hawaii. SO YOUNG PARK withdrew \$14,800.00 using her debit card at banks in Hawaii and \$2,516.75 from automated teller machines in Hawaii.

6. On or about February 2, 2015, WILLIAM B. MURPHY and MICHAEL W. SPELLMAN purchased a 2014 Polaris Side by Side Utility Vehicle for \$18,500 from Kiser Motorcycles in Kailua-Kona, Hawaii. They made a joint cash payment of \$16,000 toward the vehicle and SPELLMAN paid the balance with his Chase United Bank credit card.

7. On or about December 11, 2015, WILLIAM B. MURPHY purchased a 2016 Honda ATV for \$11,170.00. MURPHY paid with \$11,170.00 in United States currency.

All in violation of Title 18, United States Code, Section 1956(h).

#### FORFEITURE

The Grand Jury further charges:

The allegations of Counts 1 and 2, inclusive are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 982. As a result of the foregoing offenses, WILLIAM B. MURPHY, MICHAEL W. SPELLMAN, PETER REICHERT, DUSTIN ROBINSON, YOUNG HEE PARK and SO

YOUNG PARK shall forfeit to the United States any and all property constituting or derived from any proceeds they obtained directly or indirectly as a result of the said violations; and, any and all of their property used or intended to be used in any manner or part to commit or to facilitate the commission of the said violations; and any property, real or personal, involved in such offense, or any property traceable to such property; including, but not limited to the following:

- a. Lady's Signed Tiffany & Company Platinum Diamond Engagement Ring, Serial No. 34016593/P06200175.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.